



Astral Limited

Preservation of Documents Policy

Preamble:

- ❖ The Securities and Exchange Board of India has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") on September 2, 2015 to be effective from December 1, 2015.
- ❖ Regulation 9 of these Listing Regulations mandates every Listed Company to have policy on reservation of documents.
- ❖ This Policy will be applicable to the Company effective December 1, 2015.

Objective:

- ❖ The objective of this policy is to identify the documents to be preserved, mode of preservation, time for which the documents are to be preserved and ensure that all the statutory documents are preserved in compliance with the Relevant Laws.

Policy:

Regulation 9 of the Listing Regulations provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows:

- a) documents whose preservation shall be permanent in nature ;
- b) documents with preservation period of not less than eight years after completion of the relevant transactions:

Accordingly, the preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved, as per Applicable Law, for the period required by Applicable Law.

- b) Where there is no such requirement as per Applicable Law, then for such period as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance. However, the document shall be destroyed only after obtaining specific approval of the Chief Financial Officer or the Managing Director of the Company. All licenses and permissions to be preserved permanently.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I.

Mode of preservation:

The documents may be preserved either in physical form or electronic form.

Destruction of documents:

The documents shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the documents are stored, after the prior specific approval of the Chief Financial Officer or the Managing Director or any other authority as required under the Applicable Law pursuant to which the documents have been preserved.

Annexure - 1

Indicative list of documents to be preserved permanently and for at least eight years under the Companies Act 2013.

Documents to be preserved permanently:

1. The Memorandum and Articles of the Company.
2. Certification of Incorporation and subsequently amended certificates and Incorporation Papers
3. Register of Members and Index
4. Books and papers of Amalgamating Company
5. Minutes Board/Committees and General Meeting
6. Statutory Registers
7. Scrutinizers' Report

Documents to be preserved for minimum period of eight years

- a. Annual Returns
- b. Annual Reports
- c. Board/Committee Agenda
- d. Circular Resolutions
- e. Instruments creating or modifying charge
- f. Register of Debenture Holders and Index, if any
- g. Disclosure of Interest of Directors in form MBP-1
- h. Notice of Board/Committee/ General meeting
- i. Attendance Register

Documents under any other law:

All licenses and permissions to be preserved permanently. Other documents as per applicable period mentioned in the respective law.

The Policy was reviewed by the Board of Directors of the Company at its Meeting held on 11th November, 2022.
